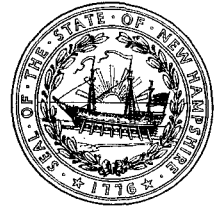




The State of New Hampshire  
*Department of Environmental Services*



Michael P. Nolin  
Commissioner

July 8, 2005

Mr. William Hines  
Vice President of Operations  
Spaulding Composites, Inc.  
55 Nadeau Drive  
Rochester, New Hampshire 03867-4637

**CERTIFIED MAIL (7099 3400 0018 1290 5750)**  
**RETURN RECEIPT REQUESTED**  
**LETTER OF DEFICIENCY**  
**No. ARD 2005-007**

Dear Mr. Hines:

On April 18, 2005, Spaulding Composites, Inc. ("Spaulding") submitted renewal applications to the New Hampshire Department of Environmental Services, Air Resources Division ("DES") for State Permit to Operate No. PO-BP-2773, and State Permit to Operate No. PO-BP-2774 ("the Permits"). During the technical review of Spaulding's renewal applications, DES identified several deficiencies. As a result of the file review, this Letter of Deficiency ("LOD") is being sent to formally notify Spaulding of the deficiencies identified by DES, and the necessary action needed to resolve them. The deficiencies are as follows:

1. Env-A 608.01 and Env-A 608.02(b) requires the owner or operator of any stationary source or device that has been issued a state permit to operate to submit a timely renewal application 90 days prior to the designated expiration date of the current state permit to operate. On October 5, 1999, DES issued the Permits to Spaulding. The Permits expired on October 31, 2004. Renewal applications were not received until April 18, 2005. Accordingly, Spaulding failed to file a timely renewal application and is currently operating without a permit, in violation of Env-A 608.
2. Condition XI Reporting Requirements of the Permits, and Env-A 907.01 require the owner or operator of any stationary source or device subject to Env-A 600 to submit an annual emissions report, which includes the actual emissions of the device and the methods used in calculating such emissions in accordance, with Env-A 704.02. Spaulding has not submitted annual emissions reports for calendar years 2002, 2003 and 2004.
3. Condition IX.E Emission-Based Fee Requirement of the Permits and Env-A 704.04 requires Spaulding to submit to DES payment of the emission-based fees and a summary of the calculations referenced in Condition X of the Permit for each calendar year by October 15<sup>th</sup> of the following calendar year. To date, Spaulding has not submitted the annual emission-based fee payment or summary of calculations for calendar years 2001, 2002 and 2003.

DES believes that Spaulding can resolve the above referenced deficiencies by taking the following actions:

4. Within 45 days of receipt of this LOD, submit the records required by the Permit as specified in paragraph 2 above, for calendar years 2002, 2003 and 2004.
5. Upon receipt of the annual emissions report, DES will invoice Spaulding for the applicable emission-based fees. Within 45 days of receipt of the emission-based fee invoice, please submit payment for calendar years 2001, 2002 and 2003 as required by Env-A 907.01 and Conditions IX and X of the Permit. In addition, payment for calendar year 2004 emissions is due July 15, 2005.

In the event that Spaulding fails to resolve the deficiencies above and within the time periods indicated, DES may initiate further action against Spaulding including issuing an order requiring the deficiencies to be corrected, and/or referring this matter to the NH Department of Justice.

Please address all information to my attention, at the following address:

NHDES Air Resources Division  
Compliance Bureau  
P.O. Box 95  
Concord, NH 03302-0095

Should you need assistance completing the annual emissions reports for emission based fees, please do not hesitate to contact Sonny Strickland, Emissions Inventory Supervisor at (603) 271-6283. Please be advised that DES will continue to monitor Spaulding's compliance status and that this letter does not provide relief against any other existing or future deficiencies. It is important that Spaulding be aware of all the requirements in its Permit.

Please feel free to contact DES should you have any questions regarding compliance with Env-A 100 *et seq.*, NH Rules Governing the Control of Air Pollution, and the requirements of your current permit. A current copy of the rules can be obtained from the DES website at [www.des.state.nh.us/Rules/air.htm](http://www.des.state.nh.us/Rules/air.htm), or by contacting the Public Information Center at (603) 271-2975. If you have any questions regarding this matter, please contact Joseph Ritz at (603) 271-1391.

Sincerely,



Pamela G. Monroe  
Compliance Bureau Administrator  
Air Resources Division

PGM/jwr

cc: R. Kurowski, EPA Region 1  
G. Hamel, Legal Unit Administrator  
B. Dorfschmidt, NHDES  
AFS #3301700031